

Statement

(08.02.2024 Edition)



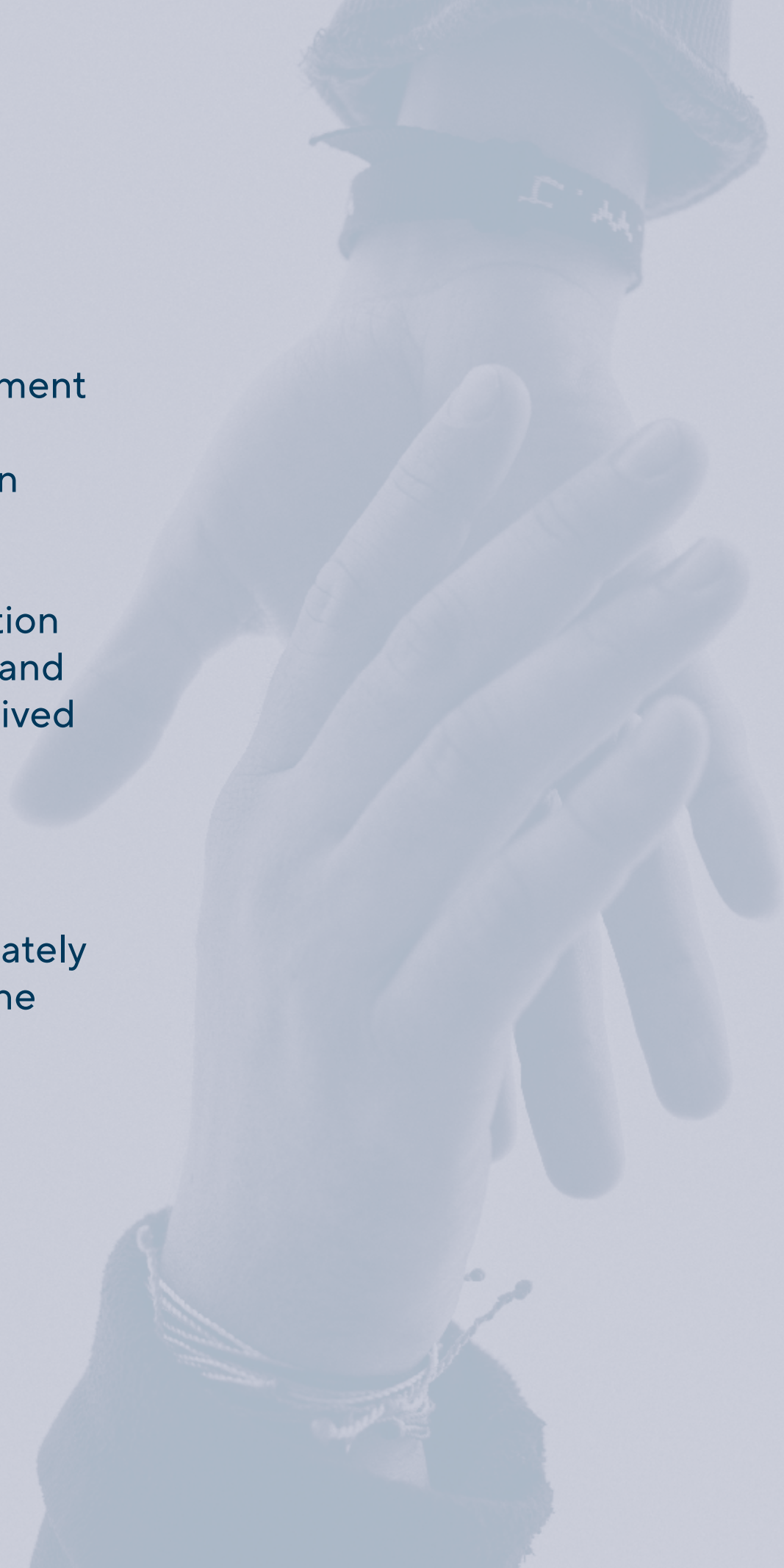
Dear Customer,

Lamberti S.p.A, representing also the companies belonging to its Group, provides you with this document that contains all the main information related to subsidiaries (general data, HSEQ policy, certification status, information on HSE, CSR, HR, Sustainability Report, etc.). This document, created to provide an adequate response to requests for general information contained in most of the evaluation questionnaires and portals and the Codes of Conduct periodically received by Customers, allows shorter response times and, therefore, faster processing of requests.

Any requests for product-specific information not contained in this document will be processed separately to allow a better and more timely management of the information.

General Manager

P.Balletto





General data

Lamberti S.p.A.

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Chemical Specialties



Our Values

The individual, winning spirit, integrity
Innovation and creativity
Working together
Sustainable industrial development
Economic stability and independence

Full description available at:

<https://www.lamberti.com/downloads/compliance.html>





Vision

We want to be a Company that expresses, through our people, values of innovation distinguished by the ability to integrate chemistry and industrial effectiveness.

We aim to do so by continuously comparing our research and the market to find a wide range of satisfactory solutions to ever-changing complex problems, in coherence with the requirements of sustainable development

Full description available at:

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Mission

We want to be renowned as a global leader in the field of certain chemical specialties used in high-potential industrial sectors, to facilitate their production processes or improve their finished products.

In doing so, we want to establish partnerships with the most important customers in the market and, where possible or appropriate, also with our suppliers.

We strive to combine the domain of the technologies we practice with the correct level of service aiming to satisfy the interests of the shareholders, staff, customers, and suppliers also by setting up stable organizations in the various geographical areas of interest, with full respect for the environment and the local communities.

Full description available at:

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Safety, health, environmental protection, energy management, and quality policy

Lamberti understands that the company's development in the medium and long term depends on a **responsible approach** to combine **environmental sustainability, energy efficiency, respect for safety, and people's health**. That is within the framework of a **continuous improvement** path aimed at the growth of the Company and the social context in which it operates. The sharing of these **values and the commitment of all employees** are key elements in achieving these corporate goals.

Principles to pursue sustainable development:

Assume compliance with Safety, Health, Environment, and the Code of Ethics, as well as the improvement of the energy performance, as guidelines in business decision-making processes, both in protecting workers and respecting the needs of surrounding communities and the environment.

Guarantee continuous compliance with current Safety, Health, Environment, and Energy regulations and evaluate its strategic suppliers according to the Group Policy.

Consider Quality, applied to all the departments of the Company, as the key to development and a necessary tool for creating a durable and defensible competitive advantage through a continuous focus on customers.

Pursue the development of chemistry respectful towards the health and safety of its employees and users, directing the research activities toward using innovative and sustainable raw materials, ensuring that the safety information of manufactured products is constantly updated and accurately made available.

Pursue the development of chemistry respectful towards the environment through the introduction of new products that combine the increasing use of renewable raw materials with the achievement of performance improvements, with reduced environmental impact and energy consumption, throughout the life cycle of the products, inspired by the principles of circularity and taking into account the entire production chain, including logistical and supply chain aspects.

Ensure responsible industrialization through the adoption of innovative processes, leading to the responsible use of resources (raw materials, water, energy) with particular attention to their reuse, where possible, and the decrease of their environmental im-

act at the end of life supporting waste reuse, recovery, and recycling and avoiding to disposal operations, drawing inspiration from the principles of the circular economy.

Constantly invest in nurturing our people to:

- Cultivate and promote talents;
- State respect for Safety, Health, and the Environment;
- Promote a culture for efficient and sustainable energy management;
- Maintain Quality at levels of excellence;
- Promote proper work practices;
- Prevent any form of illegal, child, forced, or compulsory labor
- Protect the respect for human rights
- Encourage tolerance towards others;
- Ensure equal opportunity and the prevention of all forms of discrimination and harassment.

Communicate openly and transparently with our employees, local communities, and relevant authorities, aware of our Social Responsibility.

Develop indicators for improvement and periodically review them to assess performances and compliance with the Safety, Health, Environmental Protection, Energy Management, and Quality policy. **Prevent** all forms of corruption and protect fair competition.

This Group Policy is supplemented by the Policies of individual Affiliates and production units.

To view the Lamberti Group Code of Ethics:
<https://www.lamberti.com/downloads/compliance.html>

Paolo Lamberti

PRESIDENTE

ETHIC CODE

The Board of Directors of Lamberti S.p.A., with its first resolution dated December 15, 2010, approved its Model of 'Organization, Management, and Control' according to Legislative Decree 231/2001 and adopted the Lamberti Group Code of Ethics, periodically updated. To view the Lamberti Group Code of Ethics: <https://www.lamberti.com/downloads/compliance.html>

HEALTH, SAFETY, ENVIRONMENT, QUALITY AND OTHER CERTIFICATIONS

The Lamberti Group has obtained various voluntary certifications in Health, Safety, Environment, and Quality (ISO 45001, ISO 14001, ISO 9001, etc.).

For details, please see the dedicated section of our website at <https://www.lamberti.com/downloads/certifications.html>

Responsible Care

Lamberti is committed to safeguarding health, safety, and the environment by improving the performance of all business activities in these areas by adopting and implementing the Responsible Care program.

Lamberti has undergone an Audit of the Verification Scheme prepared by Federchimica, resulting in compliance with the principles and requirements of the Responsible Care Program. This certificate can be downloaded at the following address: <https://www.lamberti.com/downloads/certifications.html>

In January 2015, Lamberti signed the Responsible Care Global Charter.

SUBSTANCE REGULATION

REACH

The REACH Regulation (Reg. 1907/2006/EC) entails the commitment of Lamberti S.p.A. and its Group companies to ensure the registration and proper management of substances and products that we market. This commitment involves significant human and economic resources, but it can ensure better use of chemical substances both in the workplace and in living environments, leading to the complete management of the chemical substance from synthesis to disposal. Lamberti ensures communication between producers and/or importers and downstream users, providing REACH Declarations and Safety Data Sheets for its products to enable customers to comply with REACH regulations.

For further details, please refer to the dedicated section of our website at <https://www.lamberti.com/info/REACH.html>

International inventories extra-EU

Lamberti S.p.A. and Group companies are committed to ensuring the compliance of substances and/or mixtures marketed in non-European countries, respecting the requirements of regulations and inventories in force in the destination country. Lamberti ensures communication between producers and/or importers and downstream users by providing Inventory Status Declarations and Safety Data Sheets for its products to enable customers to comply with the destination country's requirements.

Safety data sheets (SDS)

Lamberti S.p.A. and Group companies provide all indications regarding product classification through the issuance of SDS, allowing the customer to conduct a risk assessment when purchasing a product and/or using it in combination with other products. Any changes occurring in the product classification during the supply period are communicated to the customer through the issuance of a new SDS and the corresponding notification of the availability of the updated SDS.

Conflict Minerals

The Dodd-Frank Wall Street Reform and Consumer Protection Act - Title XV - Section 1502 of the U.S. government, signed in July 2010, requires publicly traded companies to ensure that the raw materials used for the production of their products are not linked to the conflict in Congo, meaning they are not sourced from the Democratic Republic of Congo or any of its neighboring countries (Zambia, Angola, Central African Republic, Sudan, Uganda, Rwanda, Burundi, and Tanzania), by tracing and monitoring their mineral supply chains. Concerning Conflict Minerals (minerals, metal compounds, or other substances containing Tungsten, Tantalum, Tin, and Gold), it is noted that such minerals are not necessary for the 'functionality or production' of our products and are not intentionally added to the product or any component of the product.

Dual Use

Concerning Regulation (EU) 2021/821 (the 'Dual Use Regulation'), which 'establishes a Union regime for the control of exports, brokering, technical

assistance, transit, and transfer of dual-use items.' (Art.1) Lamberti S.p.A. ensures absolute compliance with the obligations of the Regulation in international transactions related to its products and products of Group companies.

SOCIAL RESPONSIBILITY

The Lamberti Group Ethics Code ensures the organization's commitment to aspects of Social Responsibility (to view the Lamberti Group Code of Ethics: <https://www.lamberti.com/info/Code-of-ethics-in-different-languages.html>), in compliance with the essential requirements outlined by major international standards (e.g., SA8000).

In particular, it ensures that concerning:

Child's labor

Regarding work activity, Lamberti:

- Does not initiate the recruitment process with individuals under the age of 18 and does not even consider evaluating applications from minors.
- Does not employ and/or support the hiring of minors (under 18 years of age);
- Does not expose young workers (aged between 15 and 18 years) to any internships in hazardous, strenuous, or health-damaging situations, both within and outside the workplace.

Complaints right

- All workers have access to transparent, fair, and confidential procedures leading to a prompt, impartial, and fair resolution of issues that may arise within the scope of their employment relationship.
- Complaint mechanisms align with the United Nations Guiding Principles on Business and Human Rights and are well-communicated and accessible to enable workers to report any problems.
- Complaint mechanisms ensure the confidentiality of the complainant unless the complainant authorizes disclosure to a specific person.
- Those reporting a complaint or participating in an investigation into a complaint must not face retaliation.
- Complaints are addressed effectively, promptly, and respectfully and are escalated to the appropriate management level.

Forced labor

- Does not engage in or support the use of forced labor
- Does not require personnel to deposit money
- Does not retain original identity documents

Health & safety

- Ensures to the extent reasonably practicable and technologically feasible concerning all present risks, a safe and healthy workplace in compliance with current national legislation.
- Provides all personnel with regular and documented training in health and safety. Also, ensures that such training for newly hired or reassigned personnel.
- Ensures all personnel have access to clean restrooms and drinking water.

Freedom of association and collective bargaining

- Respect the right of all personnel to form and join trade unions of their choice, as well as the right to collective bargaining.
- Guarantees that worker representatives are not subjected to discrimination and that such representatives can communicate with their constituents in the workplace.

Discrimination

Concerning discrimination based on race, ethnicity, age, role, gender, gender identity, color, religion, country of origin, sexual orientation, marital status, pregnancy, disability, social class, union membership, personal characteristics, health status, or political opinions, or any other reason established by local law:

- Ensures that discrimination is not practiced or supported in hiring, compensation, access to training, promotion, dismissal, or retirement and does not interfere with personnel's right to follow principles or practices or to satisfy needs based on their own cultural identity.
- Does not permit disrespectful or offensive behaviors that violate the dignity and freedom of individuals.

Disciplinary procedures

- For employees and managers, reference is made to the sanctioning framework provided by current national legislation or defined in the applicable collective labor agreement (CCNL).
- Does not resort to the use of corporal punishment, physical or mental coercion, or verbal abuse.

Working hours

- Adheres to the working hours prescribed by current national legislation or defined in the applicable collective labor agreement (CCNL). Any overtime work complies with national laws and, unless otherwise agreed upon, is always negotiated.

Remuneration

- Ensures that the salary paid is in line with legal or minimum industrial wage standards. Also ensures that salary deductions are not for disciplinary purposes and that remuneration allowances are regularly and thoroughly explained to workers.
- Ensures that work is performed within the framework of formally established employment relationships based on labor and social security legislation.

Harassment, abuse, and other types of intimidation

The Lamberti Group considers any act or behavior that could be considered harassment, abuse, violence, or other forms of intimidation in the workplace unacceptable and commits to taking appropriate measures against perpetrators of such behavior.

The Lamberti Group prohibits and works to counteract any form of physical, sexual, psychological, or verbal harassment and behaviors and words that may offend or intimidate individuals in their work performance.

The Lamberti Group actively participates in developing a workplace free from all forms of harassment based on gender, race, ethnic origin, nationality, or religion, in full compliance with local legislation.

CORPORATE DUE DILIGENCE

The Lamberti Group, as a global employer and player in the specialty chemical industry, is committed to operating responsibly and sustainably in every part of the world where it is present, as well as along its value chain.

Lamberti ensures respect for human rights and does not tolerate child labor or any other form of slavery, as indicated in the Code of Ethics and previous sections of this document.

For a comprehensive description of Lamberti's position on this topic, please refer to the "Policy for child and forced labor," which can be downloaded at: <https://www.lamberti.com/downloads/compliance.html>

BUSINESS ETHIC AND INTEGRITY

The Lamberti Group Code of Ethics ensures the organization's commitment to aspects of business ethics and integrity (to view the Lamberti Group Code of Ethics: <https://www.lamberti.com/info/Code-of-ethics-in-different-languages.html>)

In particular, it ensures that regarding:

Compliance with laws

The Lamberti Group complies with all laws and regulations applicable to the organization in the countries where it operates.

Corruption

The Lamberti Group prohibits all forms of corruption within its organization..

Gifts and benefits

The Lamberti Group has adopted an ethical code to regulate gifts and hospitality to prevent any form of influence.

Conflicts of interest

The Lamberti Group has adopted an ethical code to prevent any form of conflict of interest.

Traceability and correctness of operations

The Lamberti Group has adopted an ethical code to ensure the correctness of operations and traceability.

Confidentiality of information

The Lamberti Group has adopted an ethical code to ensure the confidentiality of information.

RESPONSIBLE PROCUREMENT

The Lamberti Group has implemented a Sustainable Procurement Policy and a Suppliers Code of Conduct that extends to all suppliers the principles outlined in this document. Please refer to the documents provided at the following address: <https://www.lamberti.com/downloads/compliance.html>

SUSTAINABILITY

Since 2019, the Lamberti Group has been producing a Sustainability Report to share its performance and commitments with stakeholders. For details, please refer to the sustainability page on our website at the following link: <https://www.lamberti.com/sustainable-circular-policy.html>

Starting in 2022, the Lamberti Group will disclose its environmental data to its customers through the Carbon Disclosure Project (CDP).

Furthermore, Lamberti S.p.A. has been assessing its performance in the field of Corporate Social Responsibility through the EcoVadis platform for years. Interested customers can request the EcoVadis scorecard through the platform.



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